

1
2
3
4
5 BEFORE THE INSURANCE COMMISSIONER
6 OF THE STATE OF WASHINGTON

7 In the Matter of

No. G02-45

8 THE APPLICATION REGARDING
9 THE CONVERSION AND
10 ACQUISITION OF CONTROL OF
11 PREMIERA BLUE CROSS AND ITS
AFFILIATES

OIC STAFF'S DISCLOSURE OF
WITNESSES IN ADDITION TO
CONSULTANTS

12 Pursuant to the Thirteenth Order: Setting Revised Case Schedule, the OIC Staff hereby
13 discloses its witnesses in addition to the OIC Staff's consultants.

14 The OIC Staff reserves the right to call each of the following as a potential witness at
15 the adjudicative hearing:

16 James T. Odiorne, Deputy Insurance Commissioner
17 Office of Insurance Commissioner
5000 Capitol Blvd.
18 Tumwater, Washington
360-725-7214

19 It is anticipated that, at the close of the evidence during the adjudicative hearing, Mr.
20 Odiorne will submit to the Commissioner the recommendation of the OIC Staff regarding the
21 action that should be taken with respect to Premiera's Form A application.

22 James E. Tompkins, Assistant Deputy Insurance Commissioner
23 Office of Insurance Commissioner
5000 Capitol Blvd.
24 Tumwater, Washington
360-725-7218
25
26

1 It is anticipated that, if called, Mr. Tompkins will testify about the OIC Staff's review
2 and analysis of Premera's Form A application including supporting documentation.

3
4 Linda Spaulding, Insurance Examiner
5 Office of Insurance Commissioner
6 5000 Capitol Blvd.
7 Tumwater, Washington
8 360-725-7217

9 It is anticipated that, if called, Ms. Spaulding will testify about the OIC Staff's review
10 and analysis of Premera's Form A application including supporting documentation.

11 Lichiou Lee, Actuary
12 Office of Insurance Commissioner
13 5000 Capitol Blvd.
14 Tumwater, Washington
15 360-725-7128

16 It is anticipated that, if called, Ms. Lee will testify about rate regulation of health care
17 service contractors' products, including Premera's, in Washington.

18 Carol Schultz, Paralegal
19 Antitrust Division, Office of the Attorney General
20 900 Fourth Avenue #2000
21 Seattle, WA 98164
22 206-464-5832

23 It is anticipated that, if called, Ms. Schultz will testify about the preparation of
24 summaries of witness interviews reviewed by Dr. Keith Leffler.

25 Ed Neary, Manager Health Care Analysis
26 First Choice Health Network
601 Union St. #1100
Seattle, WA, 98101
206-292-8255

1 It is anticipated that, if called, Mr. Neary will testify about the preparation of the FCHN
2 provider fee schedule used by Dr. Leffler in his report.

3 Dean Barber, Manager, Provider Services, or
4 Brodie Dychinco, Supervisor, Provider Network Management
Asuris Northwest
5 c/o Leonard A. Hagen, Vice President & General Counsel
Regence BlueShield, 1800 Ninth Avenue
6 Seattle, WA 98101
206-464-8005

7 It is anticipated that, if called, Mr. Barber and Mr. Dychinco will testify about the
8 preparation of the Asuris provider fee schedule used by Dr. Leffler in his report.

9 The OIC Staff has listed the following Premera employees for the purpose of ensuring
10 that certain subjects relevant to the Form A application will be addressed during the testimony
11 including: The nature and potential impact on Premera and its management of the
12 whistleblower suit the subject of an article that appeared in the *Seattle Post-Intelligencer* on
13 October 17, 2003; the reason or reasons relied upon by Premera and its management to justify
14 conversion from non-profit to for-profit status; a description of the nature and result of the suit
15 styled *Ziccardi v. AHI Healthcare Systems, Inc., et al.*; Civil No. 95-8659 in the U.S. District
16 Court for the Central District of California, Western Division, in which Mr. Barlow was
17 named as a defendant; a description of any discussions, informal or formal, regarding possible
18 affiliation between Premera and any of its subsidiaries and any third party; and an explanation
19 of the financial projections relied upon by Premera in connection with its Form A application.

20 H.R. Brereton Barlow
21 Premera
7001 220th St. S.W., MS: 310
22 Mountlake Terrace, Washington, 98043
425-670-4738

23 Kent Marquardt
24 Premera
7001 220th St. S.W., MS: 325
25 Mountlake Terrace, Washington, 98043
425-670-4128
26

1 Yoram Milo
2 Premera
3 7001 220th St. S.W.
4 Mountlake Terrace, Washington, 98043
5 425-670-5970

6 John Domeika
7 Premera
8 7001 220th St. S.W., MS: 316
9 Mountlake Terrace, Washington, 98043
10 425-670-5277

11 DATED this _____ day of November, 2003.

12 Respectfully submitted,

13 CHRISTINE O. GREGOIRE
14 Attorney General

15 _____
16 JOHN F. HAMJE
17 Special Assistant Attorney General
18 WSBA No. 32400
19 Attorneys for Office of the Insurance
20 Commissioner's Staff
21
22
23
24
25
26